

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
JEFFERSON JONES,	)	
Plaintiff	)	
	)	
v.	)	
MARY M. WALKER, in her individual	)	Civil Action No.05-10102 RWZ
capacity	)	
	)	
Defendant	)	
_____	)	

**ASSENTED TO MOTION TO EXTEND THE DISCOVERY DEADLINE**

The parties move to extend the discovery deadline. In support of their motion the parties state:

1. The plaintiff intends to take the deposition of four witnesses who reside in Brooklyn, New York. One of these witnesses, Dr. King' Asia is a potential expert.
2. Counsel for the plaintiff and the defendant have their principle place of business in Massachusetts.
3. Depositions of expert witnesses were to be completed by April 13, 2006.
4. The parties have agreed that the depositions of the New York fact witnesses should take place on the same day as the deposition of Dr. King' Asia.
5. Extending the deadline will allow all witnesses from New York to be deposed on the same day. This is in the best interest of all parties involved.

6. The parties intend to take the video depositions of the witnesses in New York. The video depositions will be used in lieu of live testimony at trial.
7. Plaintiff's medical records have not yet been produced to the defendant by the plaintiff's medical providers.
8. The parties are proceeding diligently to complete discovery in this case. The parties assent to the following changes in the discovery schedule.
  - (a) Fact discovery is to be completed by April 13, 2006;
  - (b) Plaintiff's expert disclosure by May 13, 2006;
  - (c) Defendant's expert disclosure by June 13, 2006;
  - (d) Expert witness depositions to be concluded by July 13, 2006;
  - (e) Request for admissions served by July 31, 2006;
  - (f) Dispositive motions, including motions filed pursuant to Fed.R.Civ.P. 56, filed by August 15, 2006, with opposition to follow in accordance with the Federal Rules.

Respectfully submitted,

JEFFERSON JONES

By his attorneys,

/s/ Michael Altman

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Assented to:

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By her attorneys,

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Dated: January 11, 2006